

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In re:	)	Bky. Case No.: 23-30292
	)	Chapter 7
Jenna N. Wasness,	)	
	)	
Debtor.	)	
_____	)	
	)	
Gene W. Doeling, as Bankruptcy Trustee,	)	<b>ADVERSARY COMPLAINT</b>
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Kaylee Wasness,	)	Adversary No. 23-_____
	)	
Defendant.	)	
_____	)	

Gene W. Doeling, as bankruptcy trustee, by and through his attorney, for his cause of action against the Defendant, Kaylee Wasness, alleges as follows:

1. This is an adversary proceeding brought pursuant to Bankruptcy Rule 7000(1) and § 547 of Title 11 of the United States Code.
2. Jurisdiction of this Court is based on 28 U.S.C. § 1334 in that it arises under Title 11 of the United States Code and constitutes a core proceeding as defined in Title 28 U.S.C. § 157(b)(2)(H).
3. On August 28, 2023, the Debtor, Jenna Wasness, filed a Chapter 7 bankruptcy petition in the District of North Dakota. Gene Doeling is the duly appointed and acting trustee.
4. Defendant Kaylee Wasness is the sister of the Debtor and is an insider residing in or near Larimore, North Dakota.
5. The Defendant was paid by the debtor a total of \$2,000 toward an antecedent debt within the 90 days prior to the filing of the bankruptcy petition.

6. The payments made by the Debtor to the Defendant were made while the Debtor was insolvent.

7. The payment allowed this creditor to receive more than such creditor would receive in a case under Chapter 7 of this title, had the transfer not been made, and the creditor received payment on such debt to the extent provided by the provisions of this title.

**COUNT I — PREFERENCE, 11 U.S.C. § 547**

8. The Plaintiff realleges paragraphs 1-7.

9. The Defendant received transfers totaling \$2,000 from the Debtor for her benefit, on account of an antecedent debt owed by the Debtor, made while the Debtor was insolvent, made within 90 days of the bankruptcy petition filing, that enabled the Defendant/creditor to receive more than she would have received had the transfer not been made and the Defendant/creditor had received payment as contemplated by the Bankruptcy Code. The Bankruptcy Trustee/Plaintiff is authorized to collect this transfer from the recipient/beneficiary.

THEREFORE, Plaintiff respectfully requests that the Court enter a monetary judgment in favor of the Plaintiff against the Defendant in the amount of \$2,000 and that Plaintiff be awarded fees and costs associated with the filing of this adversary.

Dated this 12<sup>th</sup> day of April, 2024.

/s/ Gene W. Doeling  
Gene W. Doeling (05078)  
KALER DOELING PLLP  
Attorney for Trustee/Plaintiff  
P.O. Box 9231  
Fargo, ND 58106  
(701) 232-8757